

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KELLY BOLDING, MICHAEL MANFREDI,
and SARAH WARD, individually and on behalf
of a class of all others similarly situated,

Plaintiffs,

V.

BANNER BANK, a Washington Corporation,

Defendant.

No. C17- 0601RSL

**CORRECTION TO
DECLARATION OF KARL
PETERSON [DKT. 112]**

I, Karl Peterson, declare as follows:

1. ***Identity of Declarant.*** I am employed by Banner Bank (“Banner”) in Boise, Idaho. I have been employed by Banner since August 1, 2011. My current position at Banner is Information Security Office Director. I am over the age of 18 years and have personal knowledge of the matters stated in this Declaration. If called and sworn as a witness, I would testify competently to them.

2. ***Corrections to My August 6, 2018, Declaration.*** On August 6, 2018, I executed a declaration [Dkt. 112] which I understand Banner filed with its response to Plaintiffs' Motion to Compel. I have two corrections to make to that declaration. First, I made a mistake regarding where I am employed by Banner. Instead of Spokane, Washington, I have been

CORRECTION TO DECLARATION OF KARL PETERSON

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1 employed by Banner in Boise, Idaho since 2011. Second, I made a mistake regarding the date
2 Iron Mountain was instructed to suspend deleting Banner's back-up tapes. Instead of January
3 2018, Banner Bank suspended the deletion of its back-up tapes by Iron Mountain in March
4 2018. But Iron Mountain's preservation of back-up tapes dating back to October 28, 2017, as
5 stated in my declaration, was and remains correct to the best of my knowledge and belief.

6 Executed at Boise, Idaho, on December 5, 2018.

7
8 By 
9 Karl Peterson

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CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2018, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure

Dated this 5th day of December, 2018.

By Kenneth E. Payson

Kenneth E. Payson, WSBA # 26369

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